



485 Madison Avenue, 7th Floor

New York, New York 10022

Tel: (212) 588-0540

Fax: (212) 202-4840

David M. Olasov

Partner

646.583.5968 Direct Dial

dolasov@olasov.com

April 19, 2021

Honorable James R. Cho
Magistrate Judge,
United States District Court for the Eastern District of New York
225 Cadman Plaza East, Room 1227 South
Brooklyn, New York 11201

Re: *La Liberte v. Reid* (1:18-cv-05398-DLI-JRC)

Dear Judge Cho:

This firm, together with L. Lin Wood of the Georgia firm L. Lin Wood, P.C. as lead counsel, represents plaintiff Roslyn La Liberte in the referenced defamation action. This case has been pending since 2018, and was just reassigned to you from Magistrate Judge Vera Scanlon. By decision dated July 15, 2020, *La Liberte v. Reid*, 966 F.3d 79 (2d Cir. July 15, 2020), the Court of Appeals for the Second Circuit, reversed the decision and judgment of Judge Irizarry dismissing the case, and remanded the case to this Court for further proceedings consistent with its opinion. Copies of the Second Circuit's opinion, the amended complaint filed November 27, 2018 and of defendant's answer served on October 30, 2020 are attached for your reference.

There are numerous motions pending before the Court, affecting the scope of permissible discovery in light of the Second Circuit's holdings, the entry of a protective order in forms submitted by each side, and a motion to compel, on which the parties were directed to confer further, on which another conference of counsel is scheduled for tomorrow. All of these can be resolved in due course.

However, the defendant also made a motion on January 25, 2021 to revoke the 2018 *pro hac vice* admission of Mr. Wood to represent Ms. La Liberte in this case. Magistrate Judge Scanlon entered an order indicating what standards and proof the defendant would have to establish to prevail on her motion. Ms. La Liberte sought out Mr. Wood's representation as one of the leading plaintiff's defamation lawyers in this country. But, in political affairs involving interests and

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involvements of Mr. Wood having nothing to do with this case or Ms. La Liberte's representation, Mr. Wood has become a focus of sharp political attention in Georgia, from which he practiced law for decades, as well as in his new residence of South Carolina, in which he is now a candidate for a high Republican party position. He has become a political lightning rod of a fashion. While we believe, as we indicated in our submissions in opposition to defendant's revocation motion, that none of these matters affects his competency to practice in this court or the right of plaintiff to continue to engage his legal services in this case, the unresolved pendency of the revocation motion creates a cloud over his representation and the right of the plaintiff to his effective representation and to the organization of plaintiff's legal team and the allocation of responsibilities. The motion has been fully briefed for several weeks. While we are very mindful of the fact that Your Honor has just been assigned to this case, we would be grateful if you could give this motion your early attention. Mr. Wood continues to be actively involved in this case, and plaintiff is eager to move the case forward in the prompt completion of discovery and readiness for trial.

Respectfully yours,

s/ David M. Olasov

David M. Olasov

Attachments

cc. All counsel of record (by ECF)